

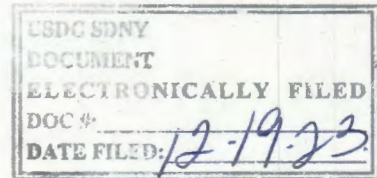
McCULLOCH | KLEINMAN

INTELLECTUAL PROPERTY ATTORNEYS

December 15, 2023

MEMO ENDORSED

VIA ECF



Hon. Valerie Figueredo
U.S.D.C. Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1660
New York, NY 10007

Re: *NY Black and Gold Corp. v. Hair Bar NYC, Inc., et al.*
Case No. 1:22-cv-10203-LAK-VF

Dear Judge Figueredo:

This firm represents the Plaintiff in the above-referenced action. I write jointly with Defendant Beny Molayev to provide a status report to the Court pursuant to the Order dated December 4, 2023 (Dkt. No. 40). The parties are pleased to report that we have reached a settlement in principle which resolves all claims in-suit. The execution and full performance of the settlement obligations agreed to by the parties will require 120 days to complete. The parties thus request that the case either be stayed during that time, or dismissed without prejudice, with the right to reopen the case if Defendants' settlement obligations are not fully satisfied by April 15, 2024.

I hereby certify, under penalty of perjury, that Defendant Molayev has reviewed and approves the filing of this letter and the joint request made herein.

Respectfully,

A handwritten signature in cursive script, appearing to read "Nate A. Kleinman".

Nate A. Kleinman, Esq.
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(212) 355-6050
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Case dismissed with prejudice and without costs subject to
right to reinstate by serving and filing a notice to that effect
on or before, 4/15/2024, if the settlement is not
consummated by then.

SO ORDERED:

A handwritten signature in cursive script, appearing to read "Lewis A. Kaplan".
Lewis A. Kaplan
S.D.J.

12/19/23